

IN THE UNITED STATES DISTRICT
COURT FOR THE MIDDLE DISTRICT
OF ALABAMA
Courtney Boyd

2007 APR -4 A 10:34

VS.
Dr. Darbouze et al.

U.S. DISTRICT COURT
MIDDLE DISTRICT ALA.

CV-2:06-CV-511-WKW

MOTION TO Identify Jane
Doe In Original Complaint

Comes Now, The plaintiff, Courtney Boyd, moves
into this Honorable Court as follows: To identify
Jane Doe in his Complaint filed on 6-8-06. The
Plaintiff submit the following:

1. The plaintiff was unable to name all of the
Defendant in his original Complaint filed on
6-08-06.
2. The plaintiff will like to identify Nurse Susanne
Bush. This nurse has continue to Retaliated
and Denied the Plaintiff proper medical care.
3. See The Amend the attached Complaint against
Nurse Bush.

page 2

Amended Complaint of Jane Doe

On 3-26, 2007, I, The Plaintiff, was in B-2-40, when nurse Bushy came Pass given out Pills. I told her that I could not move, and I have been unable to get up off the floor, and I had to urinate on myself, because nurse Bush would not help me out. I, was put into B-2-40, because I got write up by nurse Bush, and I told Lt. Mary Ann Lee, and Sgt. Marcia Scott, both wrote me up, because I said I don't want to go into C-1, because I don't have no write up, I, was put into B-2-40 in the floor, because the cell was only made for two inmate, which was already in the cell. Because I was on the floor, my whole lower body went out and I was unable to get up on March 24, 25, 26. I don't get any help until March 27, 2007, when I went to sick call. Because my lower Back stop hurting, and I was able to get up off the floor. The Officer working lock up said that they all called the HCU, but the nurse would not help me. The Defendants denied the Plaintiff proper medical care, constitutes a 8th & 14th Amendment Violation, and their negligence acted, caused the Plaintiff to suffer a great deal of serious pain and made me look and feel like a fool. See Exhibit A"

As a result the plaintiff was force to stay on the floor unable to move for 72 hour, and was force to urinate on his ~~own~~ self. The Plaintiff was prevented from transacting his Business, and suffered great deal of pain of the body and mind.

The Plaintiff Request 25,000.00 Judgment against the defendants and Court Cost.

As stated in his Original Complaint this Court has Jurisdiction under 42 U.S.C. 1331(a) & 1343. This Court has Supplemental Jurisdiction over State torts Claims under 28 U.S.C. 1367.

Wherefore, The plaintiff prays that this Honorable Court will grant this motion and order the Defendant to file an answer.

Court [Signature]

Certificate OF Service

I hereby Certify that I have served a copy of the ~~Defendants~~ Counsel, by placing it into Easterling Corr, Fac, Ma, 1136x March 28, 2007.

Court [Signature]

Page 3